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July 13, 2022

VIA ECF

Honorable John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Grant et al. v. Trump et al.*, Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

We write on behalf of Defendants Donald J. Trump and Donald J. Trump For President, Inc. (together, “Defendants”) in the above-referenced action. Pursuant to Rule I.E. of Your Honor’s Individual Practices, we respectfully request a further 30-day extension of the discovery period, which is currently set to end on July 21, 2022. We request this brief extension because despite diligent efforts, we have not yet been able to confirm a 30(b)(6) deposition witness, and therefore require additional time. This is the third request for an extension of the discovery schedule, and Plaintiffs’ counsel have consented to this request for a 30-day extension. The first request was granted on March 31, 2022 (ECF No. 65 the “Revised Scheduling Order”) and the second request was granted on June 14, 2022 (ECF No. 67). The requested extension will not affect other scheduled dates in the Case Management Plan dated November 3, 2021 (ECF No. 55) or the Revised Scheduling Order. The parties respectfully request that the Court so order the requested extension in this letter motion if it finds the same acceptable.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

/s/ Darren W. Saunders  
Darren W. Saunders  
PEROFF SAUNDERS P.C.

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cc: All counsel of record (via ECF)